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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

STANLEY RANDOLPH CRANE, an
individual,

Plaintiff

vs.

CLARK COUNTY, a political subdivision
organized under the law of the State of
Nevada; DISTRICT ATTORNEY'S OFFICE,
a political subdivision organized under the law
of the State of Nevada; DISTRICT
ATTORNEY STEVEN WOLFSON, an
individual; DEPUTY DISTRICT ATTORNEY
MELANIE H. MARLAND, an individual;
DEPUTY DISTRICT ATTORNEY
WILLIAM J. MERBACK; DEPUTY
DISTRICT ATTORNEY SKYLER
SULLIVAN, an individual; DEPUTY
DISTRICT ATTORNEY BRITTNI LEIGH
GRIFFITH, an individual; DEPUTY
DISTRICT ATTORNEY PARKER BROOKS,
an individual, and DOES I through X,
inclusive,

Defendants

Case No: 2:23-cv-00925-CDS-BNW

**STIPULATION TO EXTEND TIME
TO FILE REPLY TO PLAINTIFF'S
RESPONSE [18] AND TO STAY
DISCOVERY PENDING AN ORDER
OF THE COURT ON
DEFENDANTS' MOTION TO
DISMISS [15]**

(Second Request)

1 COME NOW Defendants, CLARK COUNTY, CLARK COUNTY DISTRICT
2 ATTORNEY'S OFFICE, DISTRICT ATTORNEY STEVEN B. WOLFSON, DEPUTY DISTRICT
3 ATTORNEY MELANIE H. MARLAND, DEPUTY DISTRICT ATTORNEY WILLIAM J.
4 MERBACK, DEPUTY DISTRICT ATTORNEY SKYLER SULLIVAN, DEPUTY DISTRICT
5 ATTORNEY BRITTNI LEIGH GRIFFITH, and DEPUTY DISTRICT ATTORNEY PARKER
6 BROOKS (hereinafter collectively "Defendants"), by and through their counsel of record, District
7 Attorney STEVEN B. WOLFSON and Deputy District Attorney Joel K. Browning of the Clark
8 County District Attorney's Office and Plaintiff, STANLEY CRANE (hereinafter "Plaintiff"), by and
9 through his attorney of records, Craig A. Mueller, Esq. of the law firm MUELLER & ASSOCIATES,
10 INC., and, pursuant to LR IA 6-1, hereby stipulate and request that this Court extend the deadline
11 regarding Defendants' Reply to Plaintiff's Response [18] filed on or around August 31, 2023, and stay
12 discovery in this matter pending an order of the court on Defendants' Motion to Dismiss [15] filed on
13 or around August 7, 2023.

14
15
16 The current deadline to file a Reply to Plaintiff's Response [18] is September 11, 2023. On
17 Friday, September 1, 2023, after receiving service of Plaintiff's Response [18], counsel for Defendants
18 reached out to Plaintiff's and requested a week extension to prepare the Reply due to the Labor Day
19 holiday and a conference for public attorneys being held September 6, 2023, to September 8, 2023, in
20 Northern Nevada. Plaintiff's counsel was amenable to this extension and requested that discovery also
21 be stayed pending a decision on the pending Motion to Dismiss [15].

22
23 Good cause exists to grant the extension for the reply to the Response [18] due to scheduling
24 conflicts. Good cause also exists to grant the stay in discovery as it will serve the interests of judicial
25 economy as the pending motion to dismiss [15] may potentially resolve all or some of the issues in
26 the case thereby narrowing the scope of discovery in this matter.

1 The parties' respective counsel have agreed to extend the reply deadline by one week until
2 September 18, 2023. This is the second stipulation for an extension to the reply deadline and the first
3 stipulation to stay discovery.

4
5 DATED this 5th day of September, 2023. DATED this 5th day of September, 2023.

6 **MUELLER & ASSOCIATES, INC**

**STEVEN B. WOLFSON DISTRICT
ATTORNEY**

7
8 /s/ Craig A. Mueller

9 CRAIG A. MUELLER, ESQ.
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Attorney for Plaintiff

/s/ Joel K. Browning

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Attorney for Defendants

ORDER

Upon Stipulation by counsel for the parties, and good cause appearing therefore,

IT IS HEREBY ORDERED that Responsive deadlines shall be as follows:

Defendants' Reply Deadline: September 18, 2023

IT IS FURTHER ORDERED that discovery in this matter be stayed until such time as the court issues an order on Defendants' pending Motion to Dismiss [15].

DATED: September 6, 2023


UNITED STATES DISTRICT JUDGE

Submitted by
STEVEN B. WOLFSON, DISTRICT ATTORNEY

/s/ Joel K. Browning

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